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State of Wisconsin
Governor Tony Evers



TO: **TJ Contractors and Subcontractors**
TMJ Contractors and Subcontractors

FROM: Margaret McMahon, Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

BWF OPERATIONS MEMO			
No:	19-15		
DATE:	09/11/2019		
W-2	<input type="checkbox"/>	EA	<input type="checkbox"/>
CF	<input type="checkbox"/>	JAL	<input type="checkbox"/>
RAP	<input type="checkbox"/>	TJ	<input checked="" type="checkbox"/>
TMJ	<input checked="" type="checkbox"/>	Other EP	<input type="checkbox"/>

SUBJECT: *Age Limitation for Older Youth in Transitional Jobs and Transform Milwaukee Jobs*

CROSS REFERENCE: [TJ and TMJ Policy Manual Sections 2.1 and 2.2](#)
[Wis. Stat. § 49.163 \(2\)](#)
[2019 Wisconsin Act 9](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to clarify the age limitation for older youth served by the Transitional Jobs (TJ) and Transform Milwaukee Jobs (TMJ) programs.

BACKGROUND

TJ and TMJ are subsidized employment programs funded by Federal Temporary Assistance for Needy Families (TANF). Federal TANF funds may be used to serve older youth in non-assistance programs, such as subsidized employment, under TANF Purpose One: "To provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives." To be considered as an "eligible family", TANF regulations allow states discretion to establish the age limit for a "child" living independently as a family of one that is higher than the federal definition of "minor child".¹

¹See preamble language at 64 Federal Register 17817 on April 12, 1999.

DCF established the age limitation for older youth (childless young adults) in the TJ and TMJ programs as 18 to 24 years of age.² An individual who is age 24 years and 1 month would be eligible for the program as a childless young adult because the individual is less than age 25. When the individual turns age 25, the individual would no longer be eligible unless he or she becomes a parent or relative and primary caretaker of a minor child.

BIENNIAL BUDGET CHANGES

[2019 Wisconsin Act 9](#) provided additional TANF funding for the TJ and TMJ programs and modified the age requirement for an individual to be a parent or a relative and primary caregiver of a minor child:

SECTION 640m. 49.163 (2) (am) 2. of the statutes is amended to read:
49.163 (2) (am) 2. If over ~~24~~25 years of age, be a biological or adoptive parent of a child under 18 years of age whose parental rights to the child have not been terminated or be a relative and primary caregiver of a child under 18 years of age.

The intent of the statutory change is to be able to serve more childless young adults with the funding source available. For this reason, the TJ and TMJ programs will continue to serve childless young adults at least age 18 years of age and less than 25 years of age.

POLICY UPDATES

There are no changes to the eligibility requirements for TJ and TMJ. The policy updates provided below are for the purposes of clarifying the intent to provide TJ and TMJ to older youth at least 18 years of age and less than 25 years of age.

Updated policy manual sections are attached to this memo and will be incorporated into the TJ and TMJ Policy Manual upon publication of this memo. Policy that was removed is struck through and policy that has been added is underlined. New sections will be clearly denoted.

DEFINITION OF OLDER YOUTH

Updated Policy

A new term and definition are created for “older youth” to align with federal language that describes young adults served in TANF. Policy is updated to obsolete the term “childless young adult” used throughout the manual.

[See attached new TJ and TMJ Policy Manual Definition](#)

REQUIREMENT TO BE A PARENT OR RELATIVE AND PRIMARY CAREGIVER

²DCF’s interpretation of the age limitation is based on Administration for Children and Families (ACF) guidance on serving older youth with TANF. See Q2, https://www.acf.hhs.gov/ofa/resource/recovery/tanf-faq#_servicing_older_youth.

Current Policy

To be eligible to participate in TJ and TMJ, an individual must be at least 18 years of age. If over 24 years of age, the individual must be the biological or adoptive parent of a minor child; or the relative and primary caregiver of a minor child whose parental rights have not been terminated.

Updated Policy

Policy is updated to clearly state that to be eligible for TJ and TMJ, an individual age 25 or older must be a parent or a relative and primary caregiver of a minor child.

[See attached updated TJ and TMJ Policy Manual Section 2.1](#)

REQUIREMENT TO BE AN OLDER YOUTH

Current Policy

To be eligible for TJ and TMJ as an older youth, an individual must be between 18 to 24 years of age with no children.

Updated Policy

Policy is updated to clearly state that to be eligible for TJ and TMJ as an older youth in the General Population, individuals must be at least 18 years of age and less than 25 years of age with no children. To be eligible as an older youth in the Foster Population, individuals also must be at least 18 years of age and less than 25 years of age; however, the no children requirement does not apply.

[See attached updated TJ and TMJ Policy Manual Section 2.1.1](#)

[See attached updated TJ and TMJ Policy Manual Section 2.1.2](#)

[See attached updated TJ and TMJ Policy Manual Section 2.1.3](#)

AGE LIMITS AND CHANGES IN ELIGIBILITY

Current Policy

An individual may become ineligible during participation in TJ and TMJ due to a minor child turning age 18 or due to an older youth without children turning age 25.

Updated Policy

Policy is updated to clarify that an individual's eligibility for TJ and TMJ can change due to no longer meeting the age requirements to be a parent or an older youth.

[See attached updated TJ and TMJ Policy Manual Section 2.2](#)

AGENCY ACTION

In keeping with the intent of the 2019-21 Biennial Budget changes to funding and eligibility for the TJ and TMJ programs, Contractors shall give priority to older youth who are at least 24 years of age and less than 25 years of age. To give priority, Contractors shall establish relationships with agencies that provide services to older youth, including but not limited to:

- FoodShare Employment and Training (FSET),
- Independent Living Transition Resource Agencies (IL TRA),
- Wisconsin Technical College System (WTCS), and
- Workforce Innovation and Opportunity Act (WIOA) Youth Program.

TJ and TMJ contractors and subcontractors must discuss the policy updates and clarifications with staff and update any relevant local agency procedures.

ATTACHMENTS

[TJ and TMJ Policy Manual Section 2.1](#)

[TJ and TMJ Policy Manual Section 2.1.1](#)

[TJ and TMJ Policy Manual Section 2.1.2](#)

[TJ and TMJ Policy Manual Section 2.1.3](#)

[TJ and TMJ Policy Manual Section 2.2](#)

CONTACTS

For TJ/TMJ Policy and CARES Processing Questions: DCFDfESBWFContracts@wi.gov

For TJ/TMJ CARES and WWP Functionality Questions: W-2 Help Desk

DCF/DFES/BWF/BY